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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

INTERNATIONAL MARKETING, INC. :  
Professional Arts Building :  
Suite C, P.O. Box B :  
Chambersburg, PA 17201 :  
Plaintiff, :

v. :

COUNTERACT BALANCING :  
BEADS, INC. :  
13029-8th Line :  
RR # 1 :  
Georgetown, Ontario L7G 4S4 :  
Defendant. :

CIVIL ACTION  
No. 1:CV-00-0697

(Magistrate Judge Smyser)

**FILED**  
HARRISBURG, PA

JAN 09 2003

MARY E. D'ANDREA, CL  
Per [Signature]  
Deputy Clerk

**MOTION FOR RECONSIDERATION**

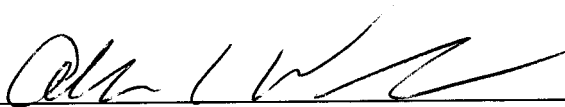
Plaintiff, International Marketing, Inc., by its counsel, respectfully  
requests that this Court reconsider its Order of January 2, 2003 insofar as it held  
that the application for attorneys' fees incurred in the appellate phase of the

contempt motion litigation was untimely and denied the request to award such fees.

Respectfully submitted,

KLETT ROONEY LIEBER & SCHORLING  
A Professional Corporation

BY:



Allen C. Warshaw, Esquire  
240 North Third Street, Suite 600  
Harrisburg, PA 17101-1503  
(717) 231-7718  
Counsel for Plaintiff

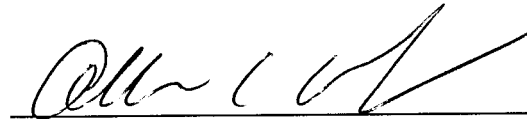
**CERTIFICATE OF NON-CONCURRENCE FOR  
PLAINTIFF'S MOTION FOR RECONSIDERATION**

Allen C. Warshaw, counsel for Plaintiff, has sought the concurrence of Defendant's counsel, Kevin W. Goldstein, by way of e-mail. The undersigned requested either concurrence or non-concurrence in the attached Motion. Defendant's counsel has indicated that he does not concur in Plaintiff's Motion for Reconsideration.

Respectfully submitted,

KLETT ROONEY LIEBER & SCHORLING  
A Professional Corporation

BY:

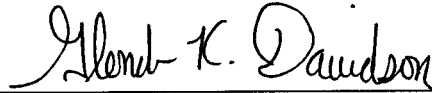


Allen C. Warshaw, Esquire  
240 North Third Street, Suite 600  
Harrisburg, PA 17101-1503  
(717) 231-7718  
Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

On the 9<sup>th</sup> day of January, 2003, I, Glenda K. Davidson, a secretary in the law offices of Klett Rooney Lieber & Schorling, hereby certify that I served a true and correct copy of the foregoing Motion for Reconsideration in the above-captioned matter via first class mail, to those persons indicated below:

Counteract Balancing Beads, Inc.  
c/o Kevin W. Goldstein, Esquire  
Ratner & Prestia  
Suite 209, Webster  
3411 Silverside Road  
P.O. Box 7228  
Wilmington, DE 19803

  
\_\_\_\_\_  
Glenda K. Davidson